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**Ticona**

May 7, 2012  
EIJ-036-12  
TPI Project – 07082011-MISC

Bishop Facility  
Highway 77 South  
P.O. Box 428  
Bishop, TX 78343

**RECEIVE**

**Certified Mail**  
**7010 0780 0000 1770 3302**

**MAY 9 2012**

Mr. David Eppler  
Air Toxics and Inspection Coordination Branch  
U.S.EPA Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

Air/Toxics & Inspection  
Coordination Branch  
6EN-A

**Subject: Clean Air Act ("CAA") Section 114 Information Request –  
Supplemental Monthly Response**

Dear Mr. Eppler,

As agreed to in our meeting on December 20, 2011, Ticona Polymers, Inc. (TPI) is submitting the following update relating to the EPA's Section 114 Information Request. The team continues to work diligently on this project and will provide the next update by May 29, 2012.

Since the April 17<sup>th</sup> report, TPI has been analyzing the MO-3 & 4 flares historical data with regard to the alternative Hydrogen Btu value of 1212 per/scf. Fuel samples have been sent to the lab for analysis, and we are currently waiting for results. This sample analysis will allow for more accurate calculations pertaining to Btu/scf as well as piping and flow control requirements related to makeup gas.

The current control valve specification sheets are being inspected, and pressure drop calculations are being evaluated for the existing pipeline. This analysis will help to ensure that the new designs will safely increase the natural gas flow to the flares.

We are currently working with a third-party supplier to secure control valves that meet the required specifications. We anticipate having information about the availability of the required control valves this week.

With respect to the GUR flare, the steam limit remains set at 0.5 – 2 while we continue to work with the flare manufacturer to identify the appropriate limit. Should you have any questions or need additional information, please contact me at (361) 584-6104.

Sincerely,

  
Buddy Joyner  
Sr. Environmental Specialist II

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